

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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IN RE: CENTURYLINK SALES  
PRACTICES AND SECURITIES  
LITIGATION

MDL No. 17-2795 (MJD/KMM)

**DEFENDANT’S MOTION TO  
TEMPORARILY STAY DISCOVERY  
PENDING RESOLUTION OF  
FORTHCOMING MOTION TO  
COMPEL ARBITRATION AND  
ENFORCE CLASS-ACTION  
WAIVERS**

This Document Relates to:

0:17-cv-02832	0:17-cv-04622
0:17-cv-04613	0:17-cv-04943
0:17-cv-04614	0:17-cv-04944
0:17-cv-04615	0:17-cv-04945
0:17-cv-04616	0:17-cv-04947
0:17-cv-04617	0:17-cv-05001
0:17-cv-04618	0:17-cv-05046
0:17-cv-04619	

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Defendant CenturyLink, Inc. (“CenturyLink”), through undersigned counsel, hereby moves this Court pursuant to Federal Rule of Civil Procedure 26 and Local Rule 7.1 for an Order temporarily staying discovery pending the resolution of a forthcoming motion to compel arbitration and enforce class action-waivers (the “Motion”).

Given CenturyLink’s substantial grounds and well-founded bases for its motion to compel arbitration and the well-settled law favoring arbitration, the Court should stay discovery until the Motion is resolved. CenturyLink will be highly prejudiced, and will incur unnecessary expense in providing substantial class-wide and other discovery, if the Court later determines that the parties agreed to arbitrate and thus the Court lacked jurisdiction over the dispute. A temporary stay of discovery would enforce the agreements of the parties and could avoid overbroad discovery and excessive burden and expense.

More detailed grounds for this Motion are set forth in the accompanying Memorandum of Law and the Declarations of Travis Beard and Douglas P. Lobel and exhibits attached thereto.

Dated: April 2, 2018

Respectfully submitted,

/s/ Douglas P. Lobel

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